

20 ROD McCULLUM: I'm Rod McCullum, Director of
21 NEI's Yucca Mountain project in Washington. I've been
22 following this repository program for about eight years
23 now.

24 I work with Paul very closely out here, and
25 I'm glad to welcome him as a colleague on the Nevada
1 end. I think that is a testament to how seriously we in
2 the nuclear industry take this project.

1 [It is indeed a project of great national
3 importance. We feel that Yucca Mountain is an important
4 part of what we like to call an integrated use fuel
5 management strategy. We safely manage our used fuel on
6 site. We safely and routinely transport it.

8 We have loaded over 900 of the nuclear waste
9 containers outside of our pools in our plants that are
10 very similar to the technologies that will be used here
11 in the TADs and in Yucca Mountain.

12 We are very -- I was very glad to hear folks
13 talking about the resource value. We are interested in
14 reprocessing, perhaps interim storage somewhere, and
15 certainly disposal at Yucca Mountain, all very important
16 pieces of doing something that is very important to
17 America.

18 Nuclear energy provides 20 percent of our
19 electricity. It does so without contributing climate
20 change or releasing other pollutants in the air. And I
21 think nowhere more so than in Nevada where the lights
22 are very bright and the air conditioners hum all year

23 round is the value of affordable, reliable, and clean
24 electricity appreciated.

25 And Nye County certainly has an opportunity to
1 become part of that. I'm very glad to be out here to
2 share a few words about industry's perspective on these
3 SEIS's, which we very much welcome. We're very glad
4 that DOE has provided the opportunity for public input
5 and comment on that for something as important as this
6 project is.

7 I'm very glad to be out here to share
8 industry's views, as well as, of course, hear the views
9 of the people of Nye County and Nevada. As I will be
10 working on the formal comments industry will submit,
11 it's important that we hear those.

12 I think if I could briefly summarize
13 industry's position in just one word on the SDEIS, that
14 would be improvements. This is definitely a necessary
15 update that we think will facilitate the licensing
16 process.

17 It's improved in two areas. The operational
18 aspects of the repository, we feel from our standpoint
19 having a lot of experience with used fuel operations
20 have been vastly simplified.

21 We have worked very closely with the
22 department on the TAD concept line, which I can
23 certainly say is a lot more than a concept. A lot of
24 significant design and engineering work has gone into
25 this. DOE has issued a final specification for the TAD
this summer for vendors, for vendors in the industry,

2 the same vendors that have been building those 900 casks
3 of used fuel we have stored on our sites.

4 I've completed a group of concept designs and
5 submitted proposals to procure demonstrations to have
6 TADs on the ground loaded and ready to come to
7 Yucca Mountain with whatever age fuel is appropriate as
8 early as 2012, certainly in time for the repository to
9 be open in 2017 or later.

10 It's improved from that operational
11 standpoint. We are very much on board with that. We
12 are very much anticipating and continuing to do so.
13 It's also improved from the analytical tools used to
14 evaluate Yucca Mountain. Long-term proponents in
15 protecting public health and safety have improved.

16 This SDEIS has taken what we've learned with
17 additional years of science in the last five or so years
18 and has reanalyzed and reevaluated, and it shows that
19 the mountain will be even safer than we thought it would
20 be with the less advanced tools we had five years ago.

21 We're now projecting in these SDEIS's that
22 radiation doses to future populations for an entire year
23 within the Yucca Mountain site will be less than what I
24 will receive on the round-trip plane flight to come out
25 here and make these comments. I don't feel at risk in
1 doing that, at least not the radiation I get up there in
2 the air.

3 Some would say how can you predict for a
4 million years? I would say, yeah, you can't absolutely

5 predict a million years, but we feel very strongly that
6 the analysis that came up with that projection of those
7 types of radiation exposures, that type of safety, that
8 type of protection is very conservative.

9 We actually have our own independent science
10 from the EPRI, Electric Power Research Institute, that
11 would indicate that those results are very conservative.
12 We see a lot of things in the SDEIS where DOE has erred
13 on the side of conservatism. And I think a significant
14 part of our comments will be to talk about our
15 perspective from our independent view of how
16 conservative that science is.

17 So we look forward to taking this information.
18 This information is a precursor step to a very rigorous,
19 very thorough licensing process, an opportunity for more
20 public input, an opportunity for those who doubt the
21 repository safety to challenge it and to have those
22 challenges adjudicated and before impartial judges,
23 basically put the project on trial.

24 We think that when you look at the substantial
25 amount of information that is in this SDEIS, that this
1 is a good start for the licensing process. We'd like to
2 get in that licensing process, see that information
3 challenged, adjudicated. We'll be participating.

4 I will cover transportation safety. I don't
5 have the time to go into that. However, I will say that
6 we have a lot of experience with that, and we're looking
7 forward to getting that railroad built as soon as
8 possible so we can get the used fuel to Yucca Mountain

9 in the best and safest manner possible.] Thank you.
